

Exhibit C



SIMMONS HANLY CONROY
A NATIONAL LAW FIRM

SIMMONSFIRM.COM
(800) 479-9533

VIA EMAIL – donna.welch@kirland.com

April 8, 2019

Donna M. Welch, P.C.
Kirkland & Ellis, L.L.P.
300 North LaSalle
Chicago, IL 60654

Re: *In re: National Prescription Opiate Litigation*, MDL No. 2804 - Reliance
Materials for Dr. Rosenthal

Dear Donna:

I write now to respond to that portion of your April 4, 2019 letter that relates to Dr. Meredith Rosenthal.¹

We have confirmed that some of the programs we produced with Dr. Rosenthal's report were not correct. We here provide you the correct programs and additional information and documentation including: (1) the order the produced programs should be run in order to replicate Dr. Rosenthal's results; and (2) the standard procedure of specifying the pathnames to raw data and to output folders so that the programs can be run in a new computing environment. We are also providing with this letter additional data files for the indirect regression analysis reflected in Tables 4 and 5; these files are needed to implement the adjustments reflected in Dr. Rosenthal's report. Dr. Rosenthal's team has rerun all of the programs from beginning to end to confirm and validate that they can be run without error and match the results presented in Dr. Rosenthal's report.

Finally, regarding your request for production of materials referenced in Dr. Rosenthal's report that are "not necessarily publicly available or free of charge," we do not read the September 6, 2018 Order on Discovery as broadly as you do with respect to published research literature. We note that ¶ 10 of the Order specifically states that "[n]othing in this paragraph expands in any way the disclosure requirements of FRCP 26(a)-(b)." We understand that what was contemplated by this paragraph was the production of expensive data sets, not published articles. This is especially true because we expect that Defendants already have much, if not all, of the published literature listed by our experts, and that, even for those articles for which you do not already have copies, you or your clients may well have

¹ The issues you raised in the same letter with respect to Drs. David Cutler and Jonathan Gruber were addressed in my earlier response to you.

We stand for our clients.

HEADQUARTERS

One Court Street
Alton, IL 62002
TEL: (618) 259-2222
FAX: (618) 259-2251

NEW YORK

112 Madison Avenue
New York, NY 10016
TEL: (212) 784-6400
FAX: (212) 213-5949

CHICAGO

230 W. Monroe
Suite 2221
Chicago, IL 60606
TEL: (312) 759-7500
FAX: (312) 759-7516

SAN FRANCISCO

455 Market
Suite 1150
San Francisco, CA 94105
TEL: (415) 536-3986
FAX: (415) 537-4120

LOS ANGELES

100 N. Sepulveda Blvd.
Suite 1350
El Segundo, CA 90245
TEL: (310) 322-3555
FAX: (310) 322-3655

ST. LOUIS

231 S. Bemiston
Suite 525
St. Louis, MO 63105
TEL: (800) 479-9533



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subscription services that allow you to access them without additional cost.

That said, in the interest of cooperation and speeding the expert process along, we are prepared to provide you copies of all such materials that we have, with the understanding that you will do the same for the materials considered by your experts. We are in the process of gathering these materials and Bates numbering them. We expect this process to be completed promptly so that we can produce all of this material to you shortly. In the meantime, if there are particular materials you do not have and are looking for, please identify them and we will make every effort to provide them immediately.

Sincerely,

Andrea Bierstein

cc: Special Master Cohen
Erin Dickinson
Pete Weinberger